

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|  |          |  |
|--|----------|--|
| <b>IN RE:</b>                              | <b>:</b> | <b>Bankruptcy No. 17-22780-GLT</b>         |
| <b>RONALD E. GARRETT,</b>                  | <b>:</b> |  |
|  | <b>:</b> | <b>Chapter 13</b>                          |
| <b>Debtor.</b>                             | <b>:</b> |  |
| <hr/>                                      | <b>:</b> | <b>Related to Document No. 63 &amp; 80</b> |
|  | <b>:</b> |  |
| <b>RONALD E. GARRETT,</b>                  | <b>:</b> | <b>Related to Claim no. 18</b>             |
|  | <b>:</b> |  |
| <b>Movant,</b>                             | <b>:</b> | <b>Hearing Date: 7/18/18</b>               |
|  | <b>:</b> |  |
| <b>vs.</b>                                 | <b>:</b> | <b>Hearing Time: 10:30 a.m.</b>            |
|  | <b>:</b> |  |
| <b>WELLS FARGO BANK, N.A. AS</b>           | <b>:</b> |  |
| <b>TRUSTEE FOR OPTION ONE</b>              | <b>:</b> |  |
| <b>MORTGAGE LOAN TRUST 2006, ASSET-</b>    | <b>:</b> |  |
| <b>BACKED CERTIFICATES, SERIES 2006-1,</b> | <b>:</b> |  |
|  | <b>:</b> |  |
| <b>Respondent.</b>                         |          |  |

**RESPONSE OF WELLS FARGO BANK, N.A.  
TO THE DEBTOR'S OBJECTION TO PROOF OF CLAIM**

Wells Fargo Bank, N.A. as Trustee for Option One Mortgage Loan Trust 2006, Asset-Backed Certificates, Series 2006-1, (hereinafter “Wells Fargo”), by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to the Debtor’s Objection to Proof of Claim, and in support thereof, avers as follows:

1-4. Admitted.

5. After reasonable investigation, U.S. Bank is without knowledge sufficient to form a belief as to the truth or falsity of the allegations set forth in paragraph five (5) of the Objection and they are therefore denied. By way of further response, the projected escrow shortage of \$1,369.52 listed on Form 410 plus the Escrow Balance of \$585.89 listed in column “O” of Form 410, equal \$1,955.41, which matches the amount set forth on page 13 of Claim 18 Part 2 for Projected Ending Balance and Required Balance Projections.

6. The allegations set forth in paragraph six (6) of the Objection are conclusions of law to which no response is necessary and are therefore denied. By way of further response, the correct amount of the escrow shortage is \$1,369.52 as set forth on Form 410.

7. The allegations set forth in paragraph seven (7) of the Objection are conclusions of law to which no response is necessary and are therefore denied.

**WHEREFORE**, Wells Fargo Bank, N.A. requests that this Honorable Court deny the Debtor's Objection to Proof of Claim.

Respectfully submitted,

PHELAN HALLINAN  
DIAMOND & JONES, LLP

Date: June 11, 2018

/s/ James A. Prostko, Esquire  
James A. Prostko, Esquire  
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| <b>Debtor.</b>                    | : | <b>Chapter 13</b>                          |
|                                   | : |  |
|                                   | : | <b>Related to Document No. 63 &amp; 80</b> |
|                                   | : |  |
| <b>RONALD E. GARRETT,</b>         | : | <b>Related to Claim no. 18</b>             |
|                                   | : |  |
| <b>Movant,</b>                    | : | <b>Hearing Date: 7/18/18</b>               |
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| <b>WELLS FARGO BANK, N.A. AS</b>  | : |  |
| <b>TRUSTEE FOR OPTION ONE</b>     | : |  |
| <b>MORTGAGE LOAN TRUST 2006,</b>  | : |  |
| <b>ASSET-BACKED CERTIFICATES,</b> | : |  |
| <b>SERIES 2006-1,</b>             | : |  |
|                                   | : |  |
| <b>Respondent.</b>                |   |  |

## CERTIFICATE OF SERVICE

I certify under penalty of perjury that on June 11, 2018, I served or caused to be served Wells Fargo Bank, National Association's Response to the Debtor's Objection to Claim, on the parties at the addresses shown below. The types of service made on the parties were: Electronic Notification and First Class Mail.

**Service by Electronic Notification**

**Lauren M. Lamb**  
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**Service by First Class Mail**

**Ronald E. Garrett**  
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Date: June 11, 2018

PHELAN HALLINAN  
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/s/ James A. Prostko

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